



American Cyanamid Company
Agricultural Division
One Cyanamid Plaza
Wayne, NJ 07470

October 29, 1984

Regional Administrator
USEPA - Region VII
324 East 11th Street
Kansas City, MO 64106

Reference: American Cyanamid Company
Hannibal, MO
EPA - RCRA ID No. MOD050226075

Dear Regional Administrator:

I refer to our attached letter to you of March 31, 1983. The Hannibal, Missouri Plant has recently revised its estimated closure and post-closure costs based on the request from your office. We accordingly wish to notify of the following changes in these figures:

	<u>Closure</u>	<u>Post-Closure</u>
Previous	\$272,500	\$2,225
New Figure	\$404,000	\$2,835

We wish to demonstrate our financial responsibility via the same mechanism as that outlined in the March 31, 1983 correspondence.

Please contact me if you have any questions relating to these revised figures.

Sincerely,

Martin G. Kemplin, CIH
Manager, Industrial Hygiene
and Environmental Affairs
Agricultural Group

MGK:lg
4/8402u
Attachment



R00301756
RCRA RECORDS CENTER

File: MOD 05 0226075

Part B Called

~~Mark~~
~~RLS~~
~~Hee~~
~~Midge~~
mg

MDNR is
Following up
on MO TSD
Financial

EPA-ARWM/PMTS reqmts.

NOV 05 1984

Region VII K.C., MO

mg
12/84



American Cyanamid Company
One Cyanamid Plaza
Wayne, NJ 07470

March 31, 1983

Regional Administrator
U.S. Environmental Protection Agency -
Region VII
324 East 11th Street
Kansas City, MO 64106

Dear Regional Administrator:

The American Cyanamid Company is submitting the attached letters demonstrating financial responsibility by financial test for non-sudden liability coverage and closure/postclosure care as requested by Subpart H of 40 CFR Parts 264 and 265. This submission is to demonstrate our good intentions to comply with the April 1, 1983 transmittal date in accord with the regulations. The attached material is generically in compliance with federal requirements under the Resource Conservation and Recovery Act and contains all the data necessary to provide financial responsibility and assurance.

Inasmuch as the company and/or it's subsidiaries owns and operates some 33 facilities subject to the pertinent RCRA regulations, we find that the paper burden involved in preparing a different letter, format, wording, reference codes, attachments and similar prescriptions required by the diverse federal and state laws in each case is such that completion within the 90 day allowance period is not possible. It is our intent, however, following this submission to so prepare and send each letter in accord with known, published or available guidelines from the various jurisdictions as soon as practicable.

Your understanding of the logistics problem and cooperation with our sincere attempt to meet all requirements under the law are appreciated.

Very truly yours,

AMERICAN CYANAMID COMPANY

A handwritten signature in cursive script, reading 'Charles P. Priesing'.

Charles P. Priesing
Manager, Special Projects
Environmental Affairs

CPP/nl
10/9187b



American Cyanamid Company
One Cyanamid Plaza
Wayne, NJ 07470

March 31, 1983

Regional Administrator
U.S. Environmental Protection Agency -
Region VII
324 East 11th Street
Kansas City, MO 64106

Reference: American Cyanamid Company
Hannibal, MO
EPA-RCRA ID. No. MOD 050226075

Dear Regional Administrator:

I am the chief financial officer of American Cyanamid Company, One Cyanamid Plaza, Wayne, New Jersey 07470. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility. See Table I.
2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility. See Table I Footnote 3.
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility. See Table I.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility. See Table I.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

ALTERNATIVE II

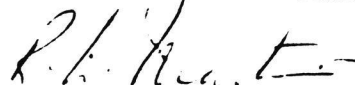
- | | |
|--|-----------------|
| 1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above) | \$ 21,088,675 |
| 2. Current bond rating of most recent issuance of this firm and name of rating service | Aa-3-Moody's |
| 3. Date of issuance of bond | September, 1981 |
| 4. Date of maturity of bond | September, 1984 |
| * 5. Tangible net worth | \$1,514,321,000 |
| * 6. Total assets in U.S. (required only if less than 90% of firm's assets are located in U.S.) | \$1,967,636,000 |

- | | YES | NO |
|--|-----|----|
| 7. Is line 5 at least \$10 million? | X | |
| 8. Is line 5 at least 6 times line 1? | X | |
| 9. Are at least 90% of firm's assets located in the U.S.? If not complete line 10. | | X |
| 10. Is line 6 at least 6 times line 1? | X | |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

AMERICAN CYANAMID COMPANY



R. L. Martino
Vice President

Dated

7/24/83

RLM/hm

0002b/3422b



Attachment

cc: Dr. David Bedan

Director, Waste Management Program

Missouri Departmental of Natural Resources

P.O. Box 1368

Jefferson City, MO 65102

TABLE I

RCRA CLOSURE/POST CLOSURE COST ESTIMATED
BY EPA REGION

<u>EPA REGION</u>		<u>CYANAMID STATE</u>	<u>I.D. NO.</u>	<u>CYANAMID LOCATION</u>	<u>COST ESTIMATES</u> <u>CLOSURE/POST CLOSURE</u>	
Massachusetts Connecticut	Massachusetts Connecticut	Massachusetts Connecticut	MAD001114016	West Springfield ³	\$ 12,100	\$ none
			CTD001864024	Stamford	550,000	none
			CTD001173467	Wallingford ²	76,000	1,300
			CTD000842484)	Danbury	12,000	none
			CTD000791095)			
<u>Subtotal</u>					650,100	1,300
<hr/>						
II New York ¹ New Jersey	New York New Jersey	New York New Jersey	NYD054065909	Pearl River	42,430	none
			NJD002173276	Bound Brook ²	13,123,614	27,030
			NJD002173144	Warners (Linden)	903,000	none
			NJT350010229	Linden Warehouse)		
			NJD002349009	Princeton	27,250	none
	Puerto Rico ¹	Puerto Rico	NJD002190304	Clifton ³	11,000	none
			PRD091200477	Manati ³	15,000	none
			PRD091197301	Carolina ³	4,000	none
			PRT000040980	Capri (Manati) ³	46,760	none
<u>Subtotal</u>					\$14,173,054	\$27,030

Table I - Cont'd
Page 2 of 4

	<u>EPA REGION</u>	<u>CYANAMID STATE</u>	<u>I.D. NO.</u>	<u>CYANAMID LOCATION</u>	<u>COST ESTIMATES</u> <u>CLOSURE/POST CLOSURE</u>	
III	Maryland West Virginia ¹	Maryland West Virginia	MDD003075942 WVD004341491	Havre de Grace Willow Island ²	\$ 8,500 1,711,100	\$ none 31,200
	<u>Subtotal</u>				1,720,100	31,200
IV	Tennessee North Carolina Mississippi Alabama Georgia Florida	Tennessee North Carolina Mississippi Alabama Georgia Florida	TND007029564 NCD003168168 MSD041226382 ALD008175408 GAD003282803 FLD057231821	Memphis ³ Charlotte ² Jackson Mobile Savannah ² Santa Rosa ²	2,600 236,800 6,000 10,700 157,835 100,000	none 14,200 none none 16,604 none
	<u>Subtotal</u>				513,935	30,804
V	Michigan ¹ Illinois Indiana Ohio ¹	Michigan Illinois Indiana Ohio	MID005360680 ILD059427856 IND005159546 OHD092821883 OHD004341509 OHD005044128	Kalamazoo ² Chicago Michigan City Evendale ³ Marietta ² Perrysburg	1,205,000 3,000 12,000 13,000 1,698,877 5,000	5,300 none none none 22,000 none
	<u>Subtotal</u>				\$2,936,477	\$27,300

Table I - Cont'd
Page 3 of 4

	<u>EPA REGION</u>	<u>CYANAMID STATE</u>	<u>I.D. NO.</u>	<u>CYANAMID LOCATION</u>	<u>COST ESTIMATES</u> <u>CLOSURE/POST CLOSURE</u>	
VI	Texas	Texas	TXD008017261	Fort Worth	\$ 12,500	\$ none
	Louisiana	Louisiana	LAD008175390	Fortier ²	578,700	26,130
			LAD008051088	Springhill	1,070	none
	<u>Subtotal</u>				592,270	26,130
<hr/>						
VII	Missouri ¹	Missouri	MOD050226075	Hannibal	272,500	2,225
	<u>Subtotal</u>				272,500	2,225
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VIII	Montana	None		None		
	Wyoming					
	North Dakota					
	South Dakota					
	Utah					
	Colorado					
	<u>Subtotal</u>				—	—
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	California	California	CAD008344228	Azusa	10,000	none
			CAD000415455	Sierra ³	48,000	none
			CAT080010929	Saugus	26,250	none
	<u>Subtotal</u>				\$ 84,250	\$ none

Table I - Cont'd
Page 4 of 4

	<u>EPA REGION</u>	<u>CYANAMID STATE</u>	<u>I.D. NO.</u>	<u>CYANAMID LOCATION</u>	<u>COST ESTIMATES</u> <u>CLOSURE/POST CLOSURE</u>
X	Washington ¹				
	Oregon				
	Idaho				
	Alaska	None	None		
	<u>Subtotal</u>				--- ---

Company Grand Total

\$20,942,686 \$145,989

- ¹ States without RCRA authorization
- ² Plants requiring Non-Sudden Liability Insurance
- ³ Plants of subsidiaries of American Cyanamid Company

AHB/rc
ST0002b/9070b



Peat, Marwick, Mitchell & Co.
Certified Public Accountants
New Jersey Headquarters

150 John F. Kennedy Parkway
Short Hills, New Jersey 07078
201-467-9650

The Board of Directors
American Cyanamid Company:

We have examined the consolidated balance sheet of American Cyanamid Company and subsidiaries as of December 31, 1982 and the related statements of earnings and earnings employed in the business and changes in financial position for the year then ended, and have issued our report thereon dated February 8, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and other auditing procedures as we considered necessary in the circumstances.

In a letter dated March 31, 1983, from the chief financial officer of American Cyanamid Company to the Environmental Protection Agency, "Total assets in U.S." and "Tangible net worth" are reported at \$1,967,636,000 and \$1,514,321,000, respectively, as of December 31, 1982. The Company has furnished us with a schedule calculating such amounts. We have compared the data included on the schedule calculating such amounts to the audited consolidated financial statements or underlying accounting records and, in connection with that procedure, no matters came to our attention which caused us to believe that such data should be adjusted by an amount that would be material to the aforementioned amounts of "Total assets in U.S." and "Tangible net worth" as of December 31, 1982.

Peat, Marwick, Mitchell Co.

March 31, 1983